



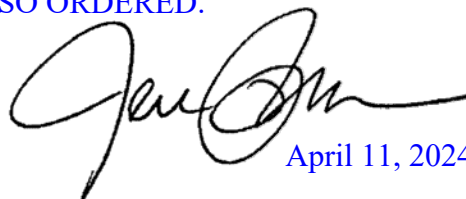
NEW YORK
VIENNA
LONDON
CHICAGO
HOUSTON
SYDNEY

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, New York
10007

Application GRANTED. The initial pretrial conference scheduled for April 16, 2024, is hereby ADJOURNED to **June 18, 2024, at 9:00 a.m.** The Clerk of Court is directed to terminate ECF Nos. 18 & 19.

SO ORDERED.



April 11, 2024

April 10, 2024

Eva-Maria Mayer

Associate | Attorney at Law
eva.mayer@zeilerfloydzad.com
mobile: +1 617 943 7957

RE: Request for adjournment [23-cv-10511] Liberty Mutual Ins. Co. v. Kuehne + Nagel Inc.

Dear Judge Furman,

We represent Defendant Kuehne + Nagel Inc. d/b/a Blue Anchor America Line ("K+N") in the above captioned matter. We write jointly with counsel for Plaintiff Liberty Mutual Insurance Co. to respectfully request a 60-day adjournment of the initial scheduling conference currently scheduled for April 16, 2024.

The reason for the requested adjournment is that defendant K+N recently filed a Third-Party Complaint against Hapag-Lloyd Aktiengesellschaft ("Hapag") on February 20, 2022 [ECF Doc. No. 12] pursuant to Fed. R. Civ. P. 14(c). Additional time is needed in order to affect service of the Third-Party Complaint and provide Hapag with an opportunity to participate in this action.

This is the second request for an adjournment of the initial scheduling conference in this matter. The parties previously requested an extension of time for K+N to answer the complaint, and for a 30-day adjournment of the initial scheduling conference, both of which were granted.

We thank the Court for its time and consideration of this matter. Please do not hesitate to contact the undersigned with any questions or comments.

Respectfully Submitted,
/s/ Eva-Maria Mayer
Eva-Maria Mayer

Zeiler Floyd Zadkovich (US) LLP

33 East 33rd St. (9th Floor, Suite 905), New York, NY 10016 USA

Zeiler Floyd Zadkovich (US) LLP is a limited liability partnership established in the State of New York, advising only on laws of the United States of America. Zeiler Floyd Zadkovich (US) LLP is a member firm of Zeiler Floyd Zadkovich (a Swiss Verein). Each member of the Swiss Verein is separately insured and practices law independently of other member firms. The Swiss Verein does not provide any legal services.

ONE GLOBAL TEAM.

FOCUSED ON WHAT YOU DO.

zeilerfloydzad.com